

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No.: 22-cv-20712-RKA

PENINSULA PETROLEUM LIMITED,

Plaintiff,

v.

CI INTERNATIONAL FUELS LLC,

Defendant. /

PLAINTIFF'S NOTICE OF DISCOVERY HEARING

Plaintiff, Peninsula Petroleum Limited (“Peninsula” or “Plaintiff”), in accordance with Magistrate Judge Lisette M. Reid’s Discovery Procedures, gives notice that a discovery hearing will be held before her via Zoom on **July 26, 2023 at 10:00 am** on the sanctions and other consequences that may result should Defendant not produce the requisite documents or otherwise fully respond to (i) Plaintiff’s Request for Production Nos. 2, 7 through 12, 15, 18, 24, and 28; and (ii) Plaintiff’s Second Request for Production Nos. 1, and 8 through 11. The parties dispute the sufficiency, adequacy, and responsiveness of the objections and responses to these requests. Counsel for the parties appear to have reached consensus on the discoverability of the items identified above, but there are significant material gaps in Defendant’s production thus far, supplemental productions needs to be made, and Plaintiff has been given no assurance to date of the completeness of the production.

The undersigned certifies that, before filing this Notice, counsel for Defendant (Lori Dilican) conferred with counsel for Plaintiff (Evan Gutwein and Joe Johnson) by video conference

on June 26, 2023, regarding the underlying discovery disputes. Counsel for the parties were unable to reach consensus on the issues except as indicated above.

Dated: July 7, 2023

Respectfully submitted,

By: /s/ Evan S. Gutwein
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-and-

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 7, 2023 I served this document via email on the parties listed in the service list below.

By: /s/ Evan S. Gutwein

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